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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

BRUCE WILLIAM POWELL

Case No. 2:14-mj-30521

Defendant(s).

AMENDED CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of 2009 to October 12, 2014, in the county of Monroe and elsewhere
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. Section 2252A(a)(5)(B)
18 U.S.C. Section 2251(a)
18 U.S.C. Section 875(d)
18 U.S.C. Section 2261A(2)

Offense Description

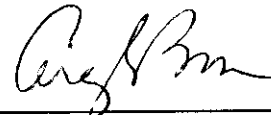
Possession of child pornography
Production of child pornography
Transmission of threats in interstate or foreign commerce
Cyber stalking

This criminal complaint is based on these facts:

See attached affidavit



Continued on the attached sheet.



Complainant's signature

Special Agent Corey Burras, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: October 16, 2014


Judge's signature

City and state: Detroit, Michigan

Mona K. Majzoub, United States Magistrate Judge
Printed name and title

AFFIDAVIT

I, Corey S. Burras, a Special Agent of the Federal Bureau of Investigation, Detroit Division, Ann Arbor Resident Agency, being duly sworn, upon my oath depose and state:

INTRODUCTION

1. Affiant is a special agent with the FBI, and has been so employed since 2002. In his current capacity, Affiant is assigned to the Detroit Division, Ann Arbor Resident Agency, Ann Arbor, Michigan. As a Federal Agent, Affiant is authorized to investigate violations of the laws of the United States, and to execute warrants issued under the authority of the United States.
2. Affiant's experience as an FBI Agent includes being assigned to conduct criminal investigations occurring in the Eastern District of Michigan. Affiant has conducted investigations of computer-related crimes, including extortion and related crimes associated with the possession, receipt, and distribution of child pornography, and well as other child exploitation crimes involving the Internet.
3. I am submitting this affidavit in support of a criminal complaint for BRUCE WILLIAM POWELL for production of child pornography (18 U.S.C. § 2251), possession of child pornography (18 U.S.C. § 2252a(a)(5)(B)), transmission of threats in interstate or foreign commerce (18 U.S.C. § 875(d)), and cyber stalking (18 U.S.C. § 2261A(2)).

4. The statements in this affidavit are based on my investigation of this matter as well as that of other FBI personnel, and law enforcement partners in other states. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation.

PROBABLE CAUSE

5. In September 2014, Victim One contacted law enforcement after she received numerous e-mails from the user of the e-mail address justfor****pics@gmail.com.¹ Affiant interviewed Victim One on September 18, 2014, and learned the following:

- a. Victim One is currently 18 years old. When Victim One was approximately 13 years old, she communicated with an unknown person online (SUSPECT 1). Victim One sent naked photographs of herself to this person. SUSPECT 1 told Victim One that his first name was Bruce, and that he lived in Florida.
- b. In late August 2008, when Victim One was still 13 years old, she began to receive text messages on her cell phone from an unknown person (SUSPECT 2). SUSPECT 2 was aggressive in the text messages, and told Victim One that he possessed naked photographs

¹ The email account utilized by SUSPECT 5 has been partially redacted in this publicly filed document to protect the identity of Victim One.

of her, and that if she did not provide him with additional explicit photographs, that he would post her pictures on the internet. Victim One was scared and intimidated, and she took the pictures requested by SUSPECT 2 and sent them to him.

- c. For the next year and a half, SUSPECT 2 repeatedly directed Victim One to take more naked photographs of herself, and she complied. According to Victim One, she took nude photographs of herself every other day and forwarded them to SUSPECT 2. SUSPECT 2 eventually ceased contacting Victim One in approximately October 2009.
- d. At some point, during Victim One's sophomore year of high school, she received a text message from an unknown person (SUSPECT 3). SUSPECT 3 demanded that Victim One take nude photographs of herself. SUSPECT 3 sent a text to Victim One stating that he/she possessed nude photographs of her.
- e. At some point, Victim One received a text message from another unknown person (SUSPECT 4). This person stated that he/she had nude photographs of Victim One, and demanded that she take more photographs in order to avoid the pictures being posted publically online. SUSPECT 4 demanded that Victim One take a large number

of photographs. In addition, SUSPECT 4 sent packages to Victim One's home containing sexual items and demanded that she take explicit photographs using the items she received.

- f. Victim One turned 18 in fall of 2013.
- g. After contact with SUSPECT 4 ended, Victim One had no contact with anyone demanding or threatening her to create more nude images until March or April 2014. At that time, she received an email from an unknown person (SUSPECT 5) utilizing email address justfor****pics@gmail.com. SUSPECT 5 told Victim One that he had all of her nude photographs, and demanded that she respond to the email or SUSPECT 5 would post her photographs online. Victim One did not immediately respond. Thereafter, she located approximately 30 nude images of herself on pornographic websites. Victim One emailed SUSPECT 5 at justfor****pics@gmail.com and requested that he remove the pictures. SUSPECT 5 responded that Victim One was to have continual contact with him and provide additional explicit photographs, or SUSPECT 5 would place all of the nude images on the internet. SUSPECT 5 told Victim One that he would take down or remove the images posted, if Victim One complied with his demands.

6. Victim One provided law enforcement with some of the email exchanges between her and SUSPECT 5 (the person using the account justfor****pics@gmail.com). Affiant has reviewed these e-mails. An excerpt of some of the most recent emails is provided below:

- a. On Sep 8, 2014 10:26 PM, justfor****pics@gmail.com wrote:

In two hours this is going to be your Facebook pic.

- b. On Sep 9, 2014 2:59 AM, justfor****pics@gmail.com wrote:

Look god damnit you have two days. Otherwise I will post EVERYTHING. Here, twitter, Instagram, Facebook, reddit (subreddit for Michigan, MSU, etc). Talk to me.

- c. On Sep 9, 2014 8:52 PM, justfor****pics@gmail.com wrote:

I fucking day left.

- d. On Sep 11, 2014 1:53 AM, justfor****pics@gmail.com wrote:

[Victim One], tomorrow afternoon I will be making pornhub, motherless, reddit, fetlife, xhamster, craigslist, Facebook, twitter, imgur, and Instagram accounts of you. Friday night, I will leak your pictures, name, phone number, and identity

- e. On Sep 11, 2014 4:06 PM; justfor****pics@gmail.com wrote:

Accounts made. I have nudes of two other . . . girls BTW. By refusing to answer you're fucking them over too, outing all three of you.

- f. September 12, 2014 at 7:18:07 PM; justfor****pics@gmail.com wrote:

Alright. I'm posting the pics. Identity will come tonight. Have a few hours left to message me.

7. On September 24, 2014, a federal search warrant for the content of email account justfor****pics@gmail.com was signed by Donald Scheer, U.S. Magistrate Judge. In the search warrant return, the following was recovered:

- a. 332 email messages with pictures or videos of Victim One. Approximately 120 pictures of Victim One are explicit, including depictions of her genitalia, and were received by SUSPECT 5 prior to Victim One's 18th birthday. These images constitute child pornography.
- b. 4197 messages between SUSPECT 5 and Victim One consisting of instructions and other conversations.
- c. 5176 comments from users on pornhub.com and fetlife.com, commenting on the photos and videos of Victim One posted to those sites
- d. 121 messages with other internet users requesting that Victim One take specific pictures or videos. The other internet users sent payment to SUSPECT 5 at justfor****pics@gmail.com for the "commissions." SUSPECT 5 requested payment for these "commissions" through PayPal and GiftRocket.
- e. Emails indicating that SUSPECT 5 created profiles on the following websites or mobile phone applications: motherless.com, reddit, Kik, Skype, fetlife.com, GiftRocket, Imgur, PornHub.com, textPlus, Tumblr, Instagram, Twitter, and VideoBam. Many of the account names for these websites and applications included a variation of Victim One's first name.

8. Specifically, in March of 2014, SUSPECT 5 sent numerous emails pleading with Victim One to resume taking explicit photographs.

- a. On March 7, 2014, at 12:26AM, justfor****pics@gmail.com wrote:
If you don't answer in 24 hours I'm putting your shit on pornhub.
- b. On March 7, 2014, at 6:00AM, justfor****pics@gmail.com wrote:
You're on pornhub. Grats!
- c. On March 7, 2014, at 6:22AM, justfor****pics@gmail.com wrote:
Until you answer me I'm going to keep posting more, and finding new sites to post to. Eventually someone WILL recognize you.
- d. On March 7, 2014 at 9:47PM, Victim One responded:
Oh my god delete them all. I never got on this email anymore. I didn't see any of this
- e. On March 7, 2014, at 10:14PM justfor****pics@gmail.com wrote:
I'm sure you didn't. Well you know what to do if you want them gone.
- f. On March 8, 2014, at 1:04AM, justfor****pics@gmail.com wrote:
Either you taking pictures/videos again, including camshows this time, or you buy the existing pictures from me, \$10 a pic and \$50 a vid.
- g. On March 8, 2014, at 1:30 AM, Victim One wrote:
I don't understand why you can't leave me alone. I'm already in therapy, I've gone to pysc hospitals twice now for trying to commit suicide. Are you trying to kill me
- h. On March 8, 2014, at 1:31AM, justfor****pics@gmail.com wrote:

Of course not, but it's hard to believe you about that when you've lied about so many things

- i. On March 8, 2014 at 1:35 AM, justfor****pics@gmail.com wrote:
How about one video a week, and we talk. Normal conversations, nothing to do with sex.
- j. On March 8, 2014, at 1:38 AM, Victim One wrote:
What have I lied about? You're the one lying. You keep saying you're not gonna use these pictures. Then a couple months go by and what do you know you're back black mailing me. I don't understand what you get out of any of this. You do realize in those pictures I'm like 14
- k. On March 8, 2014, at 1:43AM, justfor****pics@gmail.com wrote:
You broke every deal we had. And I do realize that yes.
- l. On March 8, 2014, Victim One wrote:
And you're fine with that? Exploiting the body of a 14 yeAr old girl
- m. On March 8, 2014 at 1:48 AM, justfor****pics@gmail.com wrote:
You aren't 14 anymore.
- n. On March 8, 2014, at 1:50 AM, Victim One wrote:
I was in half those pictures though
- o. On March 8, 2014 at 1:53 AM, justfor****pics@gmail.com wrote:
But you aren't now. Look, I'm willing to listen to any suggestions you have, and I'll stick to any deal we make as long as you do. I already suggested one video a week, and normal conversation. . . . That's not bad.

9. In March, April and May 2014, SUSPECT 5 demanded that Victim One take explicit videos and send them to him at justfor****pics@gmail.com. On numerous

occasions, SUSPECT 5 sent Victim One pornography and asked her to replicate that pornography in her videos and pictures. SUSPECT 5 repeatedly threatened to publish all of the images and videos he possessed of Victim One if she did not comply. Victim One sent numerous explicit videos and photographs to SUSPECT 5 at justfor****pics@gmail.com.

10. On April 28, 2014, SUSPECT 5 (justfor****pics@gmail.com) told Victim One: "We're going to sell some of your panties." SUSPECT 5 further stated "I already have a buyer," and that "selling would mean fewer videos. No video in any week where you sell the panties." Victim One refused, but SUSPECT 5 continued to threaten her. SUSPECT 5 told Victim One "this is much safer for you than the videos."

11. Eventually Victim One gave into SUSPECT 5's threats and demands. On June 10, 2014, SUSPECT 5 directed Victim One to send her underwear to two addresses. One address was in Ohio, and the other was: 2000 North Meridian Road, Apt 271, Tallahassee, FL, 32303.

12. On June 18, 2014, justfor****pics@gmail.com directed Victim One to "play in [the underwear] as soon as you wake up, until you cum. I need a pic of how soaked they are at the end. Then pack them up and mail to 2000 n meridian road apt 271, Tallahassee FL 32303."

13. On June 20, 2014, VICTIM ONE asked SUSPECT 5 “What’s the address for the white and black ones,” and justfor****pics@gmail.com responded: “2000 N Meridian Rd Apt 271, Tallahassee FL, 32303.”

14. On June 30, 2014, SUSPECT 5 wrote: “Find a way. It was promised for today. Black and white panties, and ‘cute’ panties: 2000 N Meridian Rd apt 271, Tallahassee FL, 32303.”

15. The review of justfor****pics@gmail.com revealed that SUSPECT 5 took “commissions” from other internet users to have Victim One make videos and take photographs in particular poses and performing specific sex acts. SUSPECT 5 accepted payment for this service through GiftRocket and Paypal. During an exchange with one such “customer,” on August 4, 2014, the customer sent an email with the subject line “Re: Commission :),” stating: “What’s the paypal email address again?” SUSPECT 5 responded: “Valkrionn@gmail.com.” That same day, justfor****pics@gmail.com wrote to another internet user, and stated: “Either amazon card, or through paypal. In case of paypal, address is valkrionn@gmail.com which will go to me.”

16. On August 3, 2014, justfor****pics@gmail.com received an email from: “‘Bruce Powell (via Google Drive)’[valkrionn@gmail.com].” The email appears to be auto-generated in response to a request, and states:

Request to share
Video IMG_4216.MOV

You are the owner of this item and valkrionn@gmail.com has asked that you share this item with + valkrionn@gmail.com

17. An online public search for email address valkrionn@gmail.com located a Facebook profile and a photobucket account for BRUCE POWELL. A review of BRUCE POWELL's Facebook page revealed several photos of food items that were also located in the email account justfor****pics@gmail.com.

18. On his Facebook page, on February 17, 2014, BRUCE POWELL wrote : "Kitty officially has a name, Nala. Took me long enough." On March 12, 2014, SUSPECT 5 wrote Victim One from justfor****pics@gmail.com: "So I have a cat now. . . Her name is Nala."

19. A review of the Internet Protocol (IP) addresses associated with the justfor****pics@gmail.com account reveal that multiple e-mails were sent to Victim One using an IP address registered to a Microtel Inn and Suites hotel, located at 3216 North Monroe Street, Tallahassee, Florida.

20. On October 10, 2014, at approximately 8:34 a.m., an FBI agent in Tallahassee, FL conducted surveillance at 2000 North Meridian Road, Tallahassee, FL and located a white-colored vehicle with Florida license plates on it, registered to BRUCE WILLIAM POWELL.

21. On October 10, 2014, an FBI agent conducted surveillance at the Microtel Inn and Suites, located at 3216 North Monroe Street, Tallahassee, Florida. At 11:00 p.m, the agent conducting surveillance observed BRUCE WILLIAM

POWELL depart the hotel, carrying a bag. POWELL entered a white-colored vehicle registered in his name (the vehicle observed above, in paragraph 18) and drove to the 2000 North Meridian Road, Tallahassee, FL.

22. The address that POWELL lists on his driver's license is 2000 North Meridian Road, Apt 271, Tallahassee, FL.

23. On October 12, 2014, Victim One contacted Affiant. She stated that she had received an email from justfor****pics@gmail.com at approximately 5:17PM on October 11, 2014. The email stated: "This is literally your last chance to answer me. You have 24 hours. I know where you are, I know where your family is, all will be exposed unless you answer."

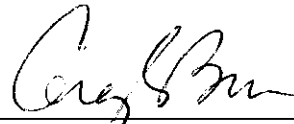
24. At approximately 10:35 p.m. on October 13, 2014, an FBI agent conducting surveillance at 2000 North Meridian Road, in Tallahassee, FL observed POWELL and another man (identified from POWELL's FaceBook page as his roommate) converse for approximately 20 minutes in the breeze way. POWELL went in and out of Apartment 271 several times, on one occasion carrying an orange cat.

CONCLUSION

25. Affiant respectfully submits that there is probable cause to believe that BRUCE POWELL produced child pornography (18 U.S.C. § 2251), possessed child pornography (18 U.S.C. § 2252A), transmitted threats in interstate or foreign

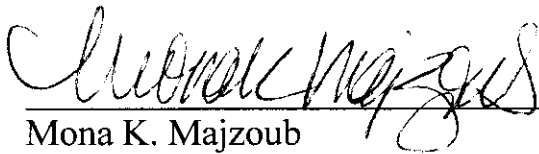
commerce (18 U.S.C. § 875(d)), and cyber stalked Victim One (18 U.S.C. § 2261A(2)).

26. Wherefore by this affidavit and application, affiant requests that the Court authorize the issuance of a criminal complaint for BRUCE POWELL.



Corey Burrás, Special Agent
Federal Bureau of Investigation

Sworn and subscribed before me this 16th day of October, 2014.



Mona K. Majzoub
U.S. Magistrate Judge